



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

April 19, 2007

RE: ALUMINUM ONE
DAPC FACILITY ID: 02 10 00 0107
NOTICE OF VIOLATION

CERTIFIED MAIL

Mr. Mike Peebles
General Manager
Aluminum One
217 Roosevelt Avenue
Minerva, Ohio 44657

Dear Mr. Peebles:

On April 5, 2007, Darren Machuga of this office visited Aluminum One in response to air pollution complaints received by this office. Two violations were noted, as well as two other potential compliance concerns. Mr. Machuga identified the following items which need to be addressed.

Violations

1. A picture of black dust emanating from Aluminum One was shown to Mr. Wike of Aluminum One. Mr. Wike indicated that the dust was emitted during the filling of the ash silo. He stated that when the ash was loaded into the silo, the bin vent on top of the silo was blown off, resulting in ash venting into the ambient air.

Ohio Administrative Code (OAC) rule 3745-15-06(B), "Malfunction of Air Pollution Control Equipment," addresses this situation. The rule requires Aluminum One shut down the malfunctioning equipment immediately, if possible. If not possible, the rule requires all possible actions be taken to minimize emissions. The rule also requires this office be notified immediately of any malfunction and the following information provided:

- a. Identification and location of such equipment including the Ohio EPA permit application number for each air contaminant source;
- b. the estimated or actual duration of breakdown;
- c. the nature and estimated quantity of air contaminants which have been or may be emitted into the ambient air during the breakdown; and
- d. information specified in the rule concerning the shutdown of equipment or measures taken to minimize emissions during the malfunction.

A copy of this rule is enclosed. Aluminum One did not notify Ohio EPA of the referenced malfunction nor provide the required information, in violation of this rule. Please provide written notification to this office of the malfunction and the information required by the rule within 15 days of receipt of this letter. Please follow the format in the rule when providing the information.

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This incident is also a deviation from the permit requirements. As such, this deviation must be recorded and included in the quarterly deviation report.

2. Mr. Machuga observed an overhead door to the furnace area that was damaged such that it remained partially open. On March 21, you had explained this situation to me in a phone conversation and indicated the parts needed to repair the door would be received the week of March 26. I understand the repairs to the door were completed on April 7.

Mr. Machuga returned to the site on April 12 and observed a different door to the furnace area, this one facing Bridge Street, open at 9:40 pm and again at 10:05 pm. There were no materials or people entering or exiting through the door at these times.

Permit-to-install No. 02-22163 requires "The doors in the vicinity of the furnace shall be kept closed except when material or people are entering or exiting the furnace area." Operating the furnace without the doors closed is a serious violation of the permit-to-install.

Please provide this office a written description of the incident, including how long the furnaces were operated without the doors closed, within 15 days of receipt of this letter.

This incident is also a deviation from the permit requirements. As such, this deviation must be included in the quarterly deviation report.

Acceptance by Ohio EPA of this information does not constitute a waiver of Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Ohio Revised Code. The determination to pursue or to decline to pursue such penalties in this case will be made by Ohio EPA at a later date.

Other Potential Compliance Concerns

1. While Mr. Machuga was at the facility on April 5, he observed dross in the yard and not under cover. Permit-to-install No. 02-21628 requires "All dross shall be kept dry and under cover, except when moving dross to the storage area and when loading trucks".

After speaking with you, this may have been part of the routine dross handling activity. Please provide this office with a written description of all the dross handling at Aluminum One within 15 days of receipt of this letter. Include the time frames involved in each step and any special measures taken in case of wet or stormy weather conditions to be sure the dross is kept dry.

2. Lastly, based upon the incident with furnace #6 on April 14 when there was a concussion after charging the furnace, this office recommends you review Aluminum One's scrap inspection procedures to minimize the chances of a recurrence. Although you indicated this particular incident did not cause any equipment damage, such occurrences have the potential to damage required air pollution control equipment.

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Should you have any comments or questions, please do not hesitate to contact me at 330-963-1216 or at Bridget.Byrne@epa.state.oh.us.

Sincerely,



Bridget Byrne
Environmental Specialist
Division of Air Pollution Control

BB:bo

enclosure